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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,  
Leonel Y.P.G., a minor child, Benjamin J.R., and  
William A.J.M.

Case No. 4:22-cv-05333-DMR

**STIPULATION FOR CONTINUANCE OF  
FURTHER CASE MANAGEMENT  
CONFERENCE AND ORDER**

Honorable Donna M. Ryu  
Trial Date: March 5, 2025  
CMC Date: September 20, 2023

Plaintiffs,  
vs.  
UNITED STATES OF AMERICA  
Defendant.

1 Plaintiffs Eduardo I.T., Edwin E.I.I., Ignacio P.G., Leonel Y.P.G., Benjamin J.R., and William  
2 A.J.M. (“Plaintiffs”) and Defendant United States of America (“Defendant”) (collectively, the  
3 “Parties”), by and through their respective counsel, hereby stipulate and agree, pursuant to Civil Local  
4 Rule 7-12 and subject to the Court’s approval, as follows:

5 WHEREAS, on May 17, 2023, the Court issued Civil Conference Minute Order (Dkt. 47)  
6 scheduling a Further Case Management Conference for September 20, 2023 at 1:30pm.

7 WHEREAS, since the May 17, 2023 Case Management Conference, the Parties have produced  
8 hundreds of thousands of pages of discovery as contemplated by their agreed-upon 90-Day Disclosure  
9 period (see Dkt. 46 at 6-7), and the Parties are currently reviewing those productions.

10 WHEREAS, the Parties have no other substantive updates or issues requiring the Court’s  
11 attention at this time.

12 WHEREAS, the Parties have met and conferred, and due to scheduling conflicts, counsel for  
13 Plaintiffs has requested, and counsel for Defendant has agreed, to continue the Case Management  
14 Conference.

15 NOW THEREFORE, the Parties stipulate that the Case Management Conference currently  
16 scheduled for September 20, 2023, be continued to a date on or after November 1, 2023.

17 DATED: September 12, 2023

Respectfully submitted,

18 ISMAIL J. RAMSEY  
19 United States Attorney

20 /s/ Kelsey J. Helland

21 Kenneth Brakebill  
22 Kelsey J. Helland  
23 Assistant United States Attorneys

24 *Counsel for Defendant*

25 PILLSBURY WINTHROP SHAW PITTMAN  
26 LLP

27 /s/ Dustin Chase-Woods

28 Blaine I. Green  
Dustin Chase-Woods

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LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS OF THE SAN FRANCISCO BAY  
AREA

Jordan Wells  
Victoria Petty

*Counsel for Plaintiffs*

ATTESTATION

I, Dustin Chase-Woods, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 12, 2023

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/s/ Dustin Chase-Woods  
Dustin Chase-Woods

1 **ORDER (AS MODIFIED)**

2 Pursuant to Stipulation, and good cause appearing, IT IS SO ORDERED that the Further Case  
3 Management Conference currently scheduled for September 20, 2023 at 1:30 p.m. is continued to  
4 November 29, 2023 at 1:30 p.m. Parties shall file an updated joint Case Management Conference  
5 Statement by November 22, 2023. All counsel and parties may access the webinar information (public  
6 hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>.

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8 IT IS SO ORDERED AS MODIFIED.

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10 Dated: September 14, 2023



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12 HONORABLE DONNA M. RYU  
13 Chief Magistrate Judge  
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